

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	CASE NO. 19-CR-3113-JB
)	
SERGIO VALDEZ,)	
)	
Defendant.)	

**DEFENDANT, SERGIO VALDEZ’ NOTICE OF JOINDER
IN DEFENDANT TOMAS SANCHEZ’ MOTION FOR PRODUCTION OF
ALLEGED CO-CONSPIRATOR STATEMENTS AND FOR
PRETRIAL HEARING ON THEIR ADMISSIBILITY (DOC. 297)**

COMES NOW, the Defendant, Sergio Valdez, by and through his attorney of record, Phillip G. Sapien, *Sapien Law, LLC*, pursuant to D.N.M.LR. Cr. 47.6, hereby gives notice that he joins in Defendant Tomas Sanchez’ Motion for Production of Alleged Co-Conspirators Statements and for a Pretrial Hearing on Their Admissibility (Doc. 297).

As grounds in support of his specific joinder, counsel for Mr. Valdez states as follows:

1. Mr. Valdez is charged in two (2) counts of the Indictment:

- a) Count 1: Conspiracy (*where all defendants’ are charged*); and
- b) Count 11: a single count of distribution of cocaine transaction that is alleged to have occurred with Mr. Valdez receiving the cocaine from defendant Padilla and Mr. Valdez delivering the cocaine to defendant Ruiz.

2. Upon information and belief, the Government intends to rely on statements, text messages, Facebook, phone calls or other form of communication and video surveillance establishing Defendant’s involvement in the above offenses.

3. To be able to address the admissibility of such communication, Defendant requests the Government set forth, in detail, the precise communications as well as any

co-conspirator's statements upon which it will rely in its case against the Defendant.

Respectfully Submitted:

Electronically filed
Phillip G. Sapien
Attorney for Defendant
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I HEREBY CERTIFY that a copy of
the foregoing pleading was electronically
delivered to all parties, this 8th day of
January 2021.

/s/
Phillip G. Sapien